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February 26, 2019
Via ECFS Filing

Ms. Marlene H. Dortch, FCC Secretary
Federal Communications Commission
9050 Junction Drive
Annapolis Junction, MD 20701

**RE: Block Line Systems, LLC
CPNI Certification for 2018
EB Docket No. 06-36**

Dear Ms. Dortch:

Enclosed for filing please find

Attached for filing is the Calendar Year 2018 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of the Block Line Systems, LLC.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3002 or via email to cwrightman@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/Connie Wightman

Connie Wightman
Consultant

tms: FCx1901

Enclosures
CW/kb

BLOCK LINE SYSTEMS, LLC

ANNUAL 47 C.F.R. § 64.2009(e) CPNI CERTIFICATION

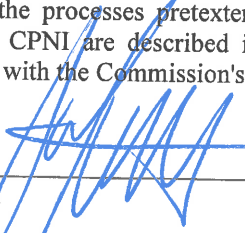
EB DOCKET NO. 06-36

Annual 64.2009(e) CPNI Certification for 2019: Covering prior calendar year 2018
Name of company(s) covered by this certification: Block Line Systems, LLC
Form 499 Filer ID: 830641
Name of signatory: John Martin
Title of signatory: President

I, John Martin, certify that I am an officer Block Line Systems, LLC. ("Company"), and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's ("Commission's" or "FCC's") Customer Proprietary Network Information ("CPNI") rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements set forth in sections 64.2001 *et seq.* of the Commission's rules. *See* 47 C.F.R. § 64.2001 (e).

The Company did not receive any customer complaints during the above-referenced certification period concerning the unauthorized release of CPNI. The Company has not taken any actions (*i.e.* instituted proceedings or filed petitions at either state commissions, the court system, or at the FCC) against data brokers during the above-referenced certification period. The Company has no information outside of Commission Docket No. 96115, or that is not otherwise publicly available (*e.g.*, through news media), regarding the processes pretexters are using to attempt to access CPNI. The steps that the Company is taking to protect CPNI are described in the attached statement that summarize the Company's operating procedures for compliance with the Commission's CPNI rules.



John Martin
President
Block Line Systems, LLC

2-25-19

Date

STATEMENT REGARDING OPERATING PROCEDURES
IMPLEMENTING 47 C.F.R. SUBPART U
GOVERNING USE OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)

Block Line Systems, LLC ("the Company") has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in Section 64.2001 *et seq.* of the Commission's rules. This attachment summarizes those practices and procedures.

A. Safeguarding Against Pretexting

1. The Company takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. The Company is committed to notifying the *FCC* of any novel or new methods of pretexting it discovers and of any actions it takes against pretexters and data brokers.

B. Training and Discipline

2. The Company trains its supervisory and non-supervisory personnel in an effort to ensure that its employees, in accordance with FCC regulations: (a) understand what CPNI is; (b) join in and carry-out the Company's obligation to protect CPNI; (c) understand when they are and when they are not authorized to use or disclose CPNI; (d) obtain customers' informed consent as required with respect to its use for marketing purposes; and (e) keep records regarding receipt of such consent, customer complaints regarding CPNI and the use of CPNI for marketing campaigns.

3. The Company employees are required to review the Company's CPNI practices and procedures and to acknowledge their comprehension thereof.

4. The Company also requires all outside Dealers and Agents to review the Company's CPNI practices and procedures and to acknowledge receipt and review thereof.

5. The Company has an express disciplinary process in place for violation of the Company's CPNI practices and procedures. The careless or intentional failure to comply with these practices and procedures may result in disciplinary action, up to and including discharge.

C. The Company's Use of CPNI

6. The Company uses CPNI for the purpose of providing a customer with the requested service and such uses as permitted by law. For example, the Company may use, disclose or permit access to CPNI for the following purposes:

- a. to initiate, render, maintain, repair, bill and collect for services;
- b. to protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or Subscription to, such services;
- c. to provide inbound telemarketing, referral or administrative services to the customer during a customer initiated call and with the customer's informed consent;
- d. to market additional services to customers that are within the same categories of service to which the customer already subscribes;
- e. to provide customer provided equipment ("CPE") and call answering, voicemail or messaging, voice storage and retrieval services, fax store-and-forward, and protocol conversion;
- f. to market services formerly known as adjunct-to-basic services; and
- g. where required by law (*e.g.*, under a lawfully issued subpoena).

C. The Company's Use of CPNI (Continued)

7. The Company does not use, disclose or permit access to CPNI to track customers that call competing service providers. The Company maintains CPNI no longer than necessary for its original purpose, except when required to maintain CPNI by law or for any legitimate business purpose. The Company does not market or otherwise sell CPNI to any third party.

8. When the Company discloses CPNI or provides access to CPNI to independent contractors or joint venture partners, it does so pursuant to confidentiality agreements that: (a) require the independent contractor/joint venture partner to use CPNI only for the purpose it has been provided; (b) prohibit the independent contractor/joint venture partner from disclosing such CPNI except under force of law; and (c) require the independent contractor/joint venture partner to have appropriate protections in place to ensure the ongoing confidentiality of the CPNI.

D. Customer Approval and Informed Consent

9. The Company has implemented a system to obtain approval and informed consent from its customers prior to the use of CPNI for marketing purposes. This system also allows for the status of a customer's CPNI approval to be clearly established prior to the use of CPNI. Prior to any solicitation for customer approval, the Company notifies customers of their right to restrict the use of, disclosure of, and access to their CPNI. The Company uses opt-in approval when using or disclosing CPNI for purposes other than permitted under opt-out approval or 47 U.S.C. § 222 and the FCC's CPNI rules. A customer's approval or disapproval remains in effect until the customer revokes or limits such approval or disapproval. Records of approvals are maintained for at least one year. The Company provides individual notice to customers when soliciting approval to use, disclose, or permit access to CPNI. The content of the Company's CPNI notices comply with Section 64.2008(c) of the FCC's rules.

10. *Opt-Out.* The Company uses opt-out for the marketing of communications related services by its employees outside the category of service to which the customer subscribes and for affiliate marketing of any communications related services. When the Company uses opt-out approval, the Company provides notification by electronic or written methods and waits at least 30 days after sending customers notice (for mail notifications, the 30 days begins to run 3 days after the notice was sent) and an opportunity to opt-out before assuming customer approval to use, disclose, or permit access to CPNI. The Company provides customers with opt-out notifications every two years. When using email for opt-out notices. The Company complies with the additional notice requirements set forth in Section 64.2008(d)(3) of the FCC's rules. Additionally, the Company makes available to every customer an opt-out method, at no additional charge, that is available 24 hours a day, seven days a week.

11. *Opt-In.* The Company uses opt-in approval for marketing by independent contractors and joint venture partners find for marketing non-communications-related services by itself and its affiliates. When the Company uses opt-in approval, the Company provides notification consistent with Section 64.2008(c) of the FCC's rules.

12. *One Time Use.* After authentication, the Company uses oral notice to obtain limited, one-time approval for use of CPNI for the duration of a call. The contents of such notice comports with Section 64.2008(f) of the FCC's rules.

E. Additional Safeguards

13. The Company maintains for at least one year records of all marketing campaigns that use its customers' CPNI, including a description of each campaign and the CPNI used, the products offered as part of the campaign, and instances where CPNI was disclosed to third parties or where third parties were allowed access to CPNI. Such campaigns are subject to a supervisory approval and compliance review process, the records of which also are maintained for a minimum of one year.
14. The Company has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules for outbound marketing situations and maintenance of records.
15. The Company designates one or more officers, as an agent or agents of the company, to sign and file a CPNI compliance certificate on an annual basis. The certificate conforms to the requirements set forth in Section 64.2009(e) of the FCC's rules.
16. The Company will provide written notice to the Commission in accordance with the requirements of Section 64.2009(f) of the FCC's rules if ever its opt-out mechanisms malfunction in the manner described therein.
17. For customer-initiated telephone inquiries regarding or requiring access to CPNI, the Company authenticates the customer (or its authorized representative), through a pre-established password, without prompting through the use of readily available biographical or account information. If the customer cannot provide a password, then the Company only discloses call detail information by sending it to the customer's address of record, or by calling the customer at the telephone number of record.
18. For online customer access to CPNI, the Company authenticates the customer (or its authorized representative) without the use of readily available biographical or account information. After the customer has been authenticated, the Company utilizes a customer-established password to authorize account access. The Company establishes passwords and has employed back-up authentication for lost or forgotten passwords consistent with the requirements of Section 64.2010(e) of the FCC's rules.
19. The Company does not have any retail locations.
20. The Company notifies customers immediately of any account changes, including address of record, authentication, online account and password related changes.
21. The Company may negotiate alternative authentication procedures for services that the Company provides to business customers that have both a dedicated account representative and a contract that specifically addresses the Company's protection of CPNI.

F. Law Enforcement and Required Disclosures

22. Within 7 days of a reasonable determination of a breach of CPNI, the Company will notify the U.S. Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI") of the breach via the central reporting facility www.fcc.gov/eb/cpni. Customers will be notified after the seven (7) day period, unless the relevant investigatory party directs the Company to delay notification, or the Company and the investigatory party agree to an earlier notification. The Company will maintain a record of all CPNI security breaches, including a description of the breach and the CPNI involved, along with notifications sent to law enforcement and affected customers.